

MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps that Phaidon International Group of Companies ("The Group") take to prevent modern slavery and human trafficking in its business and supply chains during the year ending October 2022.

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains and are committed to combating the prevention of slavery and human trafficking.

ORGANISATION'S STRUCTURE

Phaidon International is a global recruitment group comprised of six specialist recruitment brands: Selby Jennings, DSJ Global, Glocomms, EPM Scientific, Larson Maddox and LVI Associates. From our headquarters in London and a further 15 offices across North America, Europe and Asia; our consultants deliver the following services on a global basis:

- Temporary, contract and interim recruitment services
- Permanent, contingent and fixed term selection recruitment services
- Retained & executive recruitment services
- Salary surveys and market insights

The labour supplied to Phaidon International in pursuance of its operations is carried out in each of the regions in which we operate: UK, Switzerland, Germany, Netherlands, USA, Hong Kong, Singapore and China. Our organisation is controlled by a Board of Directors (executive and non-executive), who are predominately based in the UK.

This statement applies to all subsidiaries within and associated to The Group in all operating regions and every member of staff is expected to comply with this policy

SUPPLY CHAINS

In order to fulfil its activities, The Group's main supply chain includes the likes of job boards, media companies, management companies, office management services, umbrella and management companies and we expect that all our suppliers and potential suppliers aim for the same high ethical standards set by Phaidon. We understand that Phaidon International first-tier suppliers are intermediary suppliers and therefore have further contractual relationships with lower-tier suppliers, our expectation is that our first-tier suppliers promote the same high standards through their own supply chain.

As part of our engagement with any suppliers Phaidon International requires all suppliers to provide a copy of their Modern Slavery Policy and to confirm adherence to this.

COMMITMENT

Phaidon International acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Phaidon International is aware of the requirement to continually review both its internal practices in relation to its labour force and, additionally, its supply chains. Phaidon International does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

DUE DILIGENCE PROCESS

We carry out strict compliance checks in regard to the placement of all our candidates that we supply through the verification of their right to work documents and the mechanism through which they provide their services. We also ensure that any new Management Company or Solution provider is audited and is required to provide a copy of their Modern Slavery Statement and Policy for our records if applicable.

The same auditing approach is applied to any suppliers that we engage with who provide services to The Group and they are required to adhere to our Supplier Code of Conduct.

TRAINING

All our employees are required to comply with all laws and act in a way that represents The Group's ethical values, and we regularly review our company policies to ensure that they are aligned. To ensure consistency across our global business and to ensure a high level of understanding of the risk of modern slavery and human trafficking, we deliver training to our employees on modern slavery and human trafficking where relevant. Our policies are available to all our employees on our dedicated HR platform and are provided as part of the contract of employment. Each employee is required to acknowledge receipt and adhere to them. We have a Global Employee Code of Conduct document as well as employee handbook which clearly outlines dedicated channels through which any employee may voice concerns to their local HR representative or through our whistleblowing policy.

Ongoing Commitment

As an Organisation, Phaidon is committed to continuing to build on what we have in place each year to combat modern slavery and human trafficking. This coming year we intend to;

1. Implement online annual Corporate Training models
2. Implement Online Whistleblowing platform

POLICIES

The following policies are in place at Phaidon International, and further define its commitment to this statement:

- Modern Slavery Policy
- Corporate Social Responsibility Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Employee Handbooks

The above statement has been reviewed and approved by Phaidon Internationals Group Board of Directors on: 22 February 2023.

James Slipper - CFO

Signed:



For and behalf of the Phaidon Group